



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 6**

**1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733**

**April 22, 2004**

**James C. Morris III  
Thompson & Knight LLP  
1900 San Jacinto Center  
98 San Jacinto Boulevard  
Austin, Texas 78701-4081**

**RE: Gulfco Marine Maintenance Superfund Site in Freeport Texas**

**Dear Mr. Morris:**

Thank you for your April 18, 2005, electronic transmittal of an interim removal work plan for the Gulfco Marine Maintenance Superfund Site (Gulfco Site) in response to the April 1, 2005, meeting between the Environmental Protection Agency and Dow Chemical Company, Sequa Corporation, and LDL Coastal (hereinafter referred to as the "Potentially Responsible Party [PRP] Work Group").

The April 1, 2005, meeting was very productive in reconfirming our mutual commitment to investigate and clean up the Gulfco Site. I especially appreciated the level of detail the PRP Group put into its oral presentation of Gulfco's Conceptual Site Model and left the meeting heartened that the Conceptual Site Model presented would characterize the Site for quick cleanup and reuse.

Therefore, I was disappointed when, on April 18, 2005, the PRP Group submitted a scope of work that included none of the aspects of the April 1, 2005, Conceptual Site Model presentation. EPA appreciates your submittal of an interim removal scope of work and believes it can be incorporated in the overall Scope of Work. However, EPA needs to receive the Scope of Work detailing how the site will be investigated and cleaned up before EPA can move forward with the AOC and potential deferral to the state for appropriate site management.



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I would like to complete an approvable Scope of Work for the Gulfco Site cleanup by the middle of May. I ask that you please submit a complete and approvable Scope of Work in writing as soon as possible in order to quickly clean up the Gulfco Site and return it to productive reuse in the community.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Samuel Coleman".

Samuel Coleman, P.E.

Director

Superfund Division

cc: Bill Mahley  
Strasburger & Price

Alan Daniels  
LDL Coastal Limited, L.P.

Jackie Hardy  
Texas Commission on Environmental Quality